

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re

Lodge Holdings Company,

Mukilteo Lodge, LLC  
Kirkland Lodge, LLC  
Stadium Lodge, LLC  
Downtown Lodge, LLC  
Mill Creek Lodge, LLC  
Greenwood Lodge, LLC

Debtors.

Bankruptcy No. 16-15814-TWD  
(Lead Case)

Bankruptcy No. 16-15849-TWD  
Bankruptcy No. 16-15850-TWD  
Bankruptcy No. 16-15851-TWD  
Bankruptcy No. 16-15852-TWD  
Bankruptcy No. 16-15853-TWD  
Bankruptcy No. 16-15854-TWD  
(Jointly Administered Cases)

*EX PARTE* APPLICATION FOR ORDER  
APPROVING APPOINTMENT OF CHAPTER  
11 TRUSTEE

The United States Trustee hereby applies pursuant to 11 U.S.C. § 1104(d) and Fed.R.Bankr.P. 2007.1 for an *ex parte* order approving the appointment of Sheena R. Aebig as chapter 11 trustee for the following chapter 11 bankruptcy estates: (i) Lodge Holdings Co, LLC, (ii) Mukilteo Lodge, LLC, (iii) Kirkland Lodge, LLC, (iv) Stadium Lodge, LLC, (v) Downtown Lodge, LLC, (vi) Mill Creek Lodge, LLC, and (vii) Greenwood Lodge, LLC (collectively, the “Debtors”) whose cases are being jointly administered under the case of Lodge Holdings Co,

EX PARTE APPLICATION FOR ORDER APPROVING  
APPOINTMENT OF CHAPTER 11 TRUSTEE - 1

Office of the United States Trustee  
700 Stewart Street, Suite 5103  
Seattle, WA 98101-1271  
206-553-2000, 206-553-2566 (fax)

1 LLC. In support of this application, the United States Trustee respectfully states:

2 1. January 6, 2017, the Court entered an Order directing the appointment of a  
3 chapter 11 trustee over each of the Debtors' estates. ECF No. 71.

4 2. The United States Trustee has appointed Sheena Aebig, a disinterested person, as  
5 the chapter 11 trustee.

6 3. In making the appointment, the United States Trustee consulted with the  
7 following parties in interest: counsel for the Debtor; counsel for CBC Partners I, LLC; counsel  
8 for the State of Washington, counsel for the United States, counsel for Vien Bui; and counsel for  
9 Executive Hotel Seattle.

10 4. To the best of the United States Trustee's knowledge, Sheena Aebig connections  
11 with the Debtors, creditors, and any other parties in interest, their respective attorneys and  
12 accountants, the United States Trustee, and persons employed in the Office of the United States  
13 Trustee are limited to the connections set forth in the attached Chapter 11 Trustee's Acceptance  
and Declaration which is being filed concurrently herewith.

14 WHEREFORE, the United States Trustee requests that the Court enter an Order  
15 approving the appointment of Sheena Aebig as chapter 11 trustee in this case.

16 Dated this 10<sup>th</sup> day of January 2017.

17 Respectfully submitted,

18 Gail Brehm Geiger  
19 Acting U.S. Trustee for Region 18

20  
21 /s/ Kathryn Perkins  
22 Kathryn Perkins, Cal Bar 240149  
Attorney for the United States Trustee